

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

Financial Oversight & Management Board  
for Puerto Rico

as representative of

The Commonwealth of Puerto Rico, et al

**Debtors**

3:17-BK-3283 (LTS)

PROMESA Title III

(Jointly Administrated)

**Yamielle Marquez Canales/  
Claim 122090**

**REPLY TO THE NOTIFICATION OF THE FIFTY TWENTY-EIGHTH  
GLOBAL OBJECTION OF THE COMMONWEALTH OF PUERTO RICO, THE  
EMPLOYEE'S RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO AND THE PUERTO RICO  
HIGHWAYS AND TRANSPORTATION AUTHORITY TO ADR DEFICIENT  
CLAIMS**

To the Honorable Court:

**COMES NOW** Attorney César Enrique Molina Aponte, pro se, and very respectfully **SETS FORTH** and **PRAYS**:

1. The contact information of the undersigned attorney and through which you can contact Yamielle Marquez Canales, claim 122090, appears at the end of this motion.
2. We begin by stating that from the beginning, we have delivered the documentation that evidences a reliable claim. Even on September 6, 2022, as ordered, evidence was presented on these claims
3. As a matter of fact, the lawsuit in question was bifurcated and initially it was evaluated whether the plaintiffs were right in their claims and in the second part of

the lawsuit, it remains to be determined how much damage the Government of Puerto Rico caused them.

4. So far, the damage hearing has not been held since the case is paralyzed by PROMESA.
5. Thus, this Illustrious Court should not rule out this claim.
6. Attached to this document are the documents that evidence the decision of the Court of First Instance, which was also confirmed by the Court of Appeals; also, the evidence of documents sent on September 6, 2022.

**WHEREFORE** it is respectfully requested from this Honorable Court to grant this motion and dismiss the motion filed by the creditor.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/EDF systems, which will send notification of such filing to the office of the United States Trustee, and all participants of CM/ECF.

In San Juan, Puerto Rico, on the 8<sup>th</sup> day of November 2022.

*f/ César Enrique Molina*  
**CÉSAR ENRIQUE MOLINA APONTE**  
USDC-PR-300906  
Attorney for creditor

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